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Attorneys for Plaintiffs
 PARKRIDGE LIMITED AND MABEL MAK

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

PARKRIDGE LIMITED, a Hong Kong
 corporation, by Mabel Mak, and MABEL MAK,
 an individual,

Plaintiffs,

v.

INDYZEN, INC., a California
 corporation, and PRAVEEN NARRA
 KUMAR, an individual,

Defendants.

Case No. 4:16-cv-07387-JSW

**DECLARATION OF COUNTER-
 DEFENDANT RANDY DOBSON IN
 SUPPORT OF THE MOTION TO
 DISMISS COUNTERCLAIMS**

Hon. Jeffrey S. White

Date:

Time:

Dept.: Courtroom 5, 2nd Floor

Complaint Filed: December 29, 2016

INDYZEN, INC., a California corporation,

Counter-Plaintiffs,

v.

PARKRIDGE LIMITED, a Hong Kong
 corporation and RANDY DOBSON, an
 individual,

Counter-Defendants.

1 I, Randy Dobson, declare as follows:

- 2 1. I am an adult over the age of eighteen.
- 3 2. I am a Counter-Defendant in the above-captioned matter. I make this certification in
- 4 support of the Motion to Dismiss.
- 5 3. I have personal knowledge of the following facts and, if called upon as a witness, could
- 6 competently testify thereto, except as to those matters which are explicitly set forth as based
- 7 upon my information and belief and, as to such matters, I am informed and believe that
- 8 they are true and correct.
- 9 4. I have been living outside of the United States since June 2002.
- 10 5. I am a permanent resident of Hong Kong, and my family resides with me there.
- 11 6. I have no personal business dealings as an individual in State of California.
- 12 7. Any and all interactions I have had in or directed toward the State of California or any
- 13 residents of the same have been solely in an official capacity on behalf of a duly organized
- 14 and formed business entity, such as Parkridge Ltd.
- 15 8. I do not reside within the boundaries of the State of California, own no real property there,
- 16 and, with the exception of attending the May 2019 arbitration hearing in this matter, have
- 17 not been physically present in California in many years.

18 I declare under penalty of perjury that the foregoing is true and correct.

19 Dated: June 11, 2020

20 
21 Randy Dobson